

REMARKS

I. Introduction

Claims 1 to 4 are currently pending. Claims 1 and 4 have been amended herein. No new matter has been added.

In view of the foregoing amendments and the following remarks, it is respectfully submitted that all of the presently pending claims are allowable, and reconsideration is respectfully requested.

II. Rejection of Claims 1-4 Under 35 U.S.C. § 102(e)

Claims 1-4 have been rejected under 35 U.S.C. 102(e) as anticipated by U.S. Patent No. 6,412,080 to Fleming ("Fleming"). Applicants respectfully submit that Fleming does not anticipate claims 1-4 for the following reasons.

Claim 1, as amended, recites the steps of providing second subareas in the memory area, the second subareas including a first marking subarea and a second marking subarea, relative to address, and writing into each of the second subareas with an invalidity pattern *prior to an erase operation, wherein the first marking subarea comes before the at least one release pattern relative to address and the second marking subarea comes after the at least one release pattern relative to address.* (Emphasis added). It is submitted that the Fleming reference does not disclose these features of claim 1.

The Fleming reference does not refer to marking the lower and upper bounds of a reserved subarea with invalidity markings prior to an erase operation to ensure the valid completion of the erase operation. In fact, as can be seen in Figure 3C of the Fleming reference, Fleming only uses a single leading header in a memory sector and thus does not store a second invalidity pattern at the opposite end of the reserved area. As Figure 3C also shows, the so-called FlashRecordHeader referred to in the Office Action does not include an invalidity pattern.

For at least these reasons, it is submitted that the Fleming reference does not anticipate the subject matter of claim 1 or its dependent claims 2 and 3.

Since claim 4 has been amended in an analogous manner to claim 1, it is submitted that Fleming also does not anticipate claim 4.

Withdrawal of the anticipation rejection of claims 1-4 based on Fleming is therefore respectfully requested.

III. Rejection of Claim 4 Under 35 U.S.C. § 102(e)

Claim 4 has been rejected under 35 U.S.C. 102(e) as anticipated by U.S. Patent No. 6,154,808 to Nagase et al. ("Nagase"). Applicants respectfully submit that Nagase does not anticipate claim 4 for the following reasons.

Claim 4 has been amended in like manner to claim 1, and claim 4 now recites that the first marking subarea comes before the at least one release pattern relative to address, and the second marking subarea comes after the at least one release pattern relative to address.

The Nagase reference refers to a memory region that includes a data section and a separate "flag" section. This flag section is situated at a particular portion of the memory sector and does not include a first marking portion that comes before a release pattern relative to address and a second marking subarea that comes after the release pattern relative to address. For at least this reason, it is submitted that Nagase does not anticipate the subject matter of claim 4.

Withdrawal of the anticipation rejection of claim 4 based on Nagase is therefore respectfully requested.

IV. Rejection of Claim 4 Under 35 U.S.C. § 102(e)

Claim 4 has been rejected under 35 U.S.C. 102(e) as anticipated by U.S. Patent No. 6,532,514 to Haroun et al. ("Haroun"). Applicants respectfully submit that Haroun does not anticipate claim 4 for the following reasons.

As noted above, claim 4 has been amended in like manner to claim 1, and claim 4 now recites that the first marking subarea comes before the at least one release pattern relative to address, and the second marking subarea comes after the at least one release pattern relative to address.

The Haroun reference employs indicators that are not part of the memory area to be erased or written into. See Figure 1 of Haroun. Accordingly the markings or indicators are not subareas of the memory area in question. For at least this reason, it is submitted that Haroun does not anticipate the subject matter of claim 4.

Withdrawal of the anticipation rejection of claim 4 based on Haroun is therefore respectfully requested.

IV. Conclusion

It is therefore respectfully submitted that all of the presently pending claims are allowable. All issues raised by the Examiner having been addressed, an early and favorable action on the merits is earnestly solicited.

Respectfully submitted,

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